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Nancy Rumrill/R9/USEPA/US		Michele Dermer/R9/USEPA/US@EPA	
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Description			Form Used: Memo
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CO2 sequestration pilots guidance Fw: CO2 Injection Well		09/10/2009 09:54 AM	
- State Primacy			
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Body

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 $http://www.epa.gov/ogwdw000/uic/pdfs/guide_uic_carbon sequestration_final-03-07.pdf$

Nancy Rumrill

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---- Forwarded by Nancy Rumrill/R9/USEPA/US on 09/10/2009 09:51 AM -----

From: Nancy Rumrill/R9/USEPA/US

To: Adam Freedman/R9/USEPA/US@EPA
Cc: George Robin/R9/USEPA/US@EPA

Date: 09/09/2009 03:09 PM

Subject: Re: Fw: CO2 Injection Well - State Primacy

Adam, I found the following guidance was helpful.

http://www.epa.gov/ogwdw000/uic/pdfs/guide_uic_carbonsequestration_final-03-07.pdf see also http://www.epa.gov/ogwdw000/uic/wells_sequestration.html

Nancy

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Adam Freedman---09/09/2009 02:31:12 PM---Nancy and George--

From: Adam Freedman/R9/USEPA/US

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Date: 09/09/2009 02:31 PM

Subject: Fw: CO2 Injection Well - State Primacy

Nancy and George--



-Adam

---- Forwarded by Adam Freedman/R9/USEPA/US on 09/09/2009 02:28 PM -----

From: "Chan, Victor M." < VMChan@SolanoCounty.com>

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Date: 09/09/2009 01:51 PM

Subject: CO2 Injection Well - State Primacy

Adam

We had a planning meeting on the CO2 Injection Well this morning. You should be aware that there may be some conditions with the Solano County's Use Permit.

One issue that came up during today's meeting is about jurisdiction and enforcement on this relatively new program.

According to the EPA homepage on state primacy located at: http://www.epa.gov/safewater/uic/primacy.html The State of California is a "joint primacy state" for the UIC program which need clarification. I also have the following questions for the US EPA:

- 1. Once you issue your EPA permit, who is responsible for enforcement of the EPA's permit conditions? (i.e. will EPA enforce the permit conditions or is enforcement delegated to California?)
- 2. Will your EPA permit invoke the "proposed" EPA requirements for Geological Sequestration of CO2 (EPA 816-F-08-032) that is now undergoing public review?
- 3. Can I get a DRAFT of your EPA permit? I would like to coordinate the EPA's requirements with the county requirements to ensure no conflict, avoid duplication and ensure completeness.

Victor M Chan, PE, BCEE
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